

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION III 1650 Arch Street

Philadelphia, Pennsylvania 19103-2029

<u>CERTIFIED MAIL</u> RETURN RECEIPT REQUESTED

March 14, 2016

Garland E. Hilliard Olin Corporation Suite 200 3855 N. Ocoee Street Cleveland, TN 37312

Kimberly Lesniak Associate General Counsel EPEC Polymers, Inc. 1001 Louisiana Street Houston, TX 77002 Troy Pfaff
Associate General Counsel
For Global Compliance
Rockwell Automation, Inc.
1201 S. 2nd Street
Milwaukee, WI 53202

Dear Sirs:

This letter is submitted to you by the U.S. Environmental Protection Agency (EPA) for payment of the costs outlined herein. This letter includes an accounting of future response costs incurred by EPA for activities pertaining to the Morgantown Ordnance Works Disposal Area Site, Morgantown, WV. This letter is solely for the recovery of EPA's future response costs. Any fines and/or penalties due will be billed separately.

EPA seeks recovery of the future response costs pursuant to the provisions of the Consent Decree, Civil Action No. 1:02CV177 and Civil Action No. 1:03CV29, Section VI p. 13. Enclosed is a Narrative Cost Summary Report entitled, "Future Response Bill Costs from 01/01/15 to 12/31/15" dated March 1, 2016. The report provides an accounting of future response costs incurred by the United States in connection with the site for which EPA seeks reimbursement.

The stated amount of \$6,127.24 (\$13,168.36 x 46.53%) is due to be paid on or before May 16, 2016. Performing Defendants shall pay 46.53% of the total amount of each bill from EPA within sixty (60) days of receipt (Section VI p.13). Please review and adhere to all procedures and requirements, as specified in the Consent Decree pursuant to Section VI, except for the payment instructions. Please note that the

payments shall be made in accordance with this letter. Section VI.13 p.17 requires all uncontested future response costs to be paid within 60 days and contested amounts shall be placed in an interest bearing escrow account. Please make your check payable to:

EPA-Hazardous Substance Superfund

Forward your payment to:

EPA Region III Superfund Payments Cincinnati Finance Office P. O. Box 979076 St. Louis, MO 63197-9000

If express mail or a messenger service will be used to deliver your payment, the street address of our bank is below:

Environmental Protection Agency RIII P.O. Box 979076 U. S. Bank Mail Station SL-MO-C2GL 1005 Convention Plaza St. Louis, MO 63101

To send an EFT (wire transfer):

Federal Reserve Bank of New York
ABA No. 021030004
Account No. 68010727
SWIFT Address FRNYUS33
33 Liberty Street
New York, NY 10045
Note: Field Tag 4200 of the Fedwire message should read "D 68010727
Environmental Protection Agency"

The accounting information needed for a U.S. Treasury payment is:

TAS: 068 f 3875 0000

BETC (Business Event Type Code): collbca

ALC: 68010727 SGL: 1010

Taxpayer ID: 52-0852695Site ID: 03B5

At the time of payment, please send notice that payment has been made to the EPA Cincinnati Finance Office by email at CINWD_AcctsReceivable@EPA.GOV, or by mail to:

U.S. Environmental Protection Agency Cincinnati Finance Office MS:NWD 27 W. Martin Luther King Drive Cincinnati, OH 45268

To enable EPA to accurately record receipt of your payment by the established due date, the following information must be included on the face of your payment check:

Site Name/Location: Ordnance Works Disposal Area Site, Morgantown, WV

Account Number: 03B5BF00

Receivable Account Number: 2731626T0062 Civil Action No. 1:02CV177 and 1:03CV29

Interest will accrue at the current rate of .67% on any amounts unpaid by the due date. Failure to comply with the payment requirements will subject the respondent to stipulated penalties as outlined in Section VIII (Stipulated Penalties). Non-compliance will also result in further collection efforts, including the referral of the debt to the Department of Justice.

Any questions or problems regarding this billing should be directed to:

Andrew Goldman
U.S. Environmental Protection Agency (3RC41)
1650 Arch Street
Philadelphia, PA 19103
(215) 814-2487

Thank you for your cooperation.

Sincerely

Steven X. Pandza

Office of the Comptroller

Enclosures

Table of Contents

MORGANTOWN ORDNANCE WORKS, MORGANTOWN, WV SITE ID = 03 B5

NARRATIVE COST SUMMARY	Section 1
ITEMIZED COST SUMMARY	Section 2
REGIONAL PAYROLL COSTS	Section 3
REGIONAL TRAVEL COSTS	Section 4
EPA INDIRECT COSTS SUMMARY	Section 5
EPA INDIRECT COSTS	Section 6

Narrative Cost Summary

MORGANTOWN ORDNANCE WORKS, MORGANTOWN, WV SITE ID = 03 B5

- 1. The United States Environmental Protection Agency has incurred at least \$5,784.98 for Regional Payroll Costs.
- 2. The United States Environmental Protection Agency has incurred at least \$397.93 for Regional Travel Costs.
- 3. The United States Environmental Protection Agency has incurred at least \$6,985.45 for Indirect Costs.

	
Total Site Costs:	\$13,168.36
r .	

Itemized Cost Summary

MORGANTOWN ORDNANCE WORKS, MORGANTOWN, WV SITE ID = 03 B5

REGIONAL PAYROLL COSTS	\$5,784.98
REGIONAL TRAVEL COSTS	\$397.93
EPA INDIRECT COSTS	\$6,985.45
Total Site Costs:	\$13,168.36

	9
1050	
	<u>X</u>

Regional Payroll Costs

MORGANTOWN ORDNANCE WORKS, MORGANTOWN, WV SITE ID = 03 B5

Employee Name	Fiscal Year	Pay Period	Payroll Hours	Payroll <u>Costs</u>
ALLEN, SONDRA	2015	10	1.00	65.07
ENVIRONMENTAL PROTECTION SPECIALIST	2010			00101
		E=	1.00	\$65.07
ELLER, ARTHUR ACCOUNTANT	2016	03	0.50	25.37
		· ·	0.50	\$25.37
GOLDMAN, ANDREW ATTORNEY ADVISOR (GENERAL)	2015	23	0.75	72.94
		-	0.75	\$72.94
JAFOLLA, NANCY TOXICOLOGIST	2016	06	2.00	151.06
·			2.00	\$151.06
KELLY, DARLENE	2015	11	2.00	131.62
ENVIRONMENTAL PROTECTION SPECIALIST		14	1.00	65.81
		16	0.50	32.91
	1		3.50	\$230.34
MATTA, CHRISTIAN	2015	08	9.00	596.42
ENVIRONMENTAL SCIENTIST		09	6.00	401.85
		10	6.00	401.85
		11	2.00	133.95
		16	2.00	137.53
		21	3.00	206.31
		22	14.00	962.72
*		24	8.00	582.88
	2016	05	3.00	215.98
		06	14.00	1,007.92
		×=	67.00	\$4,647.41
PANDZA, STEVEN	2015	09	0.50	31.13
ACCOUNTANT		16	1.50	94.99
		-	2.00	\$126.12
PLUTA, BRUCE	2015	21	0.50	39.08

Regional Payroll Costs

MORGANTOWN ORDNANCE WORKS, MORGANTOWN, WV SITE ID = 03 B5

	Fiscal	Pay	Payroll	Payroll
Employee Name	<u>Year</u>	Period	Hours	Costs_
ENVIRONMENTAL SCIENTIST	2015	22	0.25	19.55
	2016	02	1.00	78.45
		06	1.00	78.57
			2.75	\$215.65
RANDOLPH, VIRGINIA	2015	09	0.50	27.89
ROWE, VIRGINIA E.		10	0.50	27.89
FINANCIAL SPECIALIST		14	1.50	83.68
		15	2.00	111.56
			4.50	\$251.02
Total Regional Payroll Costs			84.00	\$5,784.98

Regional Travel Costs

MORGANTOWN ORDNANCE WORKS, MORGANTOWN, WV SITE ID = 03 B5

Traveler/Vendor Name	Travel Number	Treasury Schedule	Treasury Schedule Date	Travel Costs
MATTA, CHRISTIAN	TAA01JXH	AMP150234	09/03/2015	192.74
ENVIRONMENTAL SCIENTIST	TAA01JXH	AVC150237	09/03/2015	205.19
			_	\$397.93
Total Regional Travel Costs			=	\$397.93



EPA Indirect Costs

MORGANTOWN ORDNANCE WORKS, MORGANTOWN, WV SITE ID = 03 B5

Fiscal Year	Direct Costs	Indirect Rate(%)	Indirect Costs
2015	4,625.56	112.98%	5,225.96
2016	1,557.35	112.98%	1,759.49
	6,182.91		
Total EPA Indirect Costs		-	\$6,985.45

(8)

EPA Indirect Costs

MORGANTOWN ORDNANCE WORKS, MORGANTOWN, WV SITE ID = 03 B5

FUTURE RESPONSE BILL COSTS FROM 01/01/15 TO 12/31/15

PAYROLL DIRECT COSTS

Employee Name	Fiscal <u>Year</u>	Pay Period		Payroll Costs	Ind. Rate (%)	Indirect Costs
ALLEN, SONDRA	2015	10		65.07	112.98%	73.52
				65.07		\$73.52
GOLDMAN, ANDREW	2015	23		72.94	112.98%_	82.41
				72.94		\$82.41
KELLY, DARLENE	2015	11	4	131.62	112.98%	148.70
		14		65.81	112.98%	74.35
		16	V .	32.91	112.98%_	37.18
				230.34		\$260.23
MATTA, CHRISTIAN	2015	08		596.42	112.98%	673.84
		09		401.85	112.98%	454.01
		10		401.85	112.98%	454.01
		11		133.95	112.98%	151.34
		16		137.53	112.98%	155.38
		21		206.31	112.98%	233.09
		22		962.72	112.98%	1,087.68
		24		582.88	112.98%	658.54
				3,423.51		\$3,867.89
PANDZA, STEVEN	2015	09		31.13	112.98%	35.17
		16		94.99	112.98%	107.32
				126.12	_	\$142.49
PLUTA, BRUCE	2015	21		39.08	112.98%	44.15

Report Date: 03/01/2016

Certified By Financial Management Office

EPA Indirect Costs

MORGANTOWN ORDNANCE WORKS, MORGANTOWN, WV SITE ID = 03 B5

FUTURE RESPONSE BILL COSTS FROM 01/01/15 TO 12/31/15

PAYROLL DIRECT COSTS

PLUTA, BRUCE 2015 22	19.55	440.000/	
		112.98%	22.09
	58.63	-	\$66.24
RANDOLPH, VIRGINIA 2015 09	27.89	112.98%	31.51
10	27.89	112.98%	31.51
14	83.68	112.98%	94.54
15	111.56	112.98%_	126.04
	251.02		\$283.60
Total Fiscal Year 2015 Payroll Direct Costs:	4,227.63	-	\$4,776.38
TRAVEL DIRECT COSTS			
	ravel Costs	Ind. Rate (%)	Indirect Costs
MATTA, CHRISTIAN TAA01JXH 09/03/2015	205.19 192.74	112.98% 112.98%	231.82 217.76
	397.93	112.90%	\$449.58
Total Fiscal Year 2015 Travel Direct Costs:	397.93	_	\$449.58
Total Fiscal Year 2015:	4,625.56	=	\$5,225.96

EPA Indirect Costs

MORGANTOWN ORDNANCE WORKS, MORGANTOWN, WV SITE ID = 03 B5

FUTURE RESPONSE BILL COSTS FROM 01/01/15 TO 12/31/15

PAYROLL DIRECT COSTS

	3			Ind.	
Employee Name	Fiscal <u>Year</u>	Pay <u>Period</u>	Payroll <u>Costs</u>	Rate _(%)	Indirect Costs
ELLER, ARTHUR	2016	03	25.37	112.98%	28.66
			25.37		\$28.66
JAFOLLA, NANCY	2016	06	151.06	112.98%_	170.67
			151.06		\$170.67
MATTA, CHRISTIAN	2016	05	215.98	112.98%	244.01
		06	1,007.92	112.98%_	1,138.75
			1,223.90		\$1,382.76
PLUTA, BRUCE	2016	02	78.45	112.98%	88.63
		06	78.57	112.98%_	88.77
			157.02		\$177.40
Total Fiscal Year 2016 Payroll Direc	t Costs:		1,557.35	=	\$1,759.49
Total Fiscal Year 20	16:		1,557.35	=	\$1,759.49
Total EPA Indirect Costs			,	=	\$6,985.45